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March 7, 2016

VIA ECF

Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

Re: *Levy v. BASF Metals Limited, et al.*, No. 1:15-cv-7317-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent HSBC Bank USA, NA in the above-captioned action, and write on behalf of all Defendants to request an expansion of the page limits for Defendants' motions to dismiss the Amended Complaint, and the related opposition and reply papers. The parties have been unable to reach agreement on an appropriate expansion of the existing page limits. (As Your Honor might recall, the Amended Complaint is over 110 pages in length and purports to plead 11 causes of action.) Defendants respectfully request leave to file briefs of the following page lengths:

- All Defendants propose to file a joint memorandum of law addressing common issues under Rule 12(b)(6) (failure to state a claim). Defendants request 50 pages for their opening memorandum, 50 pages for Plaintiff's opposition, and 25 pages for Defendants' reply.
- For any Defendant that intends to file a supplemental memorandum of law addressing issues unique to it under either Rule 12(b)(6) or Rule 12(b)(2) (personal jurisdiction), Defendants request a total of 17 pages for each memorandum and reply combined; and 17 pages for Plaintiff's opposition.

We understand that Plaintiff intends to propose the following page lengths:

- Defendants' joint memorandum of law addressing common issues under Rule 12(b)(6): 50 pages for Defendants' opening memorandum, 100 pages for Plaintiff's opposition, and 15 pages for Defendants' reply.
- Supplemental memoranda of law addressing unique issues under either Rule 12(b)(6) or Rule 12(b)(2): on the assumption that Defendants be limited to two supplemental briefs, 17 pages for each opening memorandum, 17 pages for Plaintiff's opposition, and 5 pages for each reply.



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Defendants thank the Court for its consideration of this request.

Respectfully submitted,

Leah Friedman